1 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA 2 3 IN RE: BARD IVC FILTERS MDL No.: 2:15-md-02641-PHX-DGC 4 PRODUCTS LIABILITY LITIGATION 5 STIPULATION OF DISMISSAL WITH 6 vs. **PREDJUDICE** 7 THIS DOCUMENT RELATES TO THE CASES LISTED ON THE EXHIBIT 8 ATTACHED HERETO. 10 11 COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto ("Plaintiffs") 12 and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Defendants"), and file this 13 Stipulation of Dismissal with Prejudice, and in support thereof, respectfully show the Court as 14 15 follows: 16 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and 17 Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A with prejudice 18 to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their 19 own costs. 20 21 22 23 24 25 26 27 28

1 WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby 2 respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety with 3 prejudice to the re-filing of same and order that these parties are to bear their own costs. 4 Respectfully submitted this 1st day of March, 2021. 5 6 7 /s/ Richard B. North /s/ Kevin S. Klein 8 Kevin Klein, Esq. Richard B. North, Jr. kk@rosenbaumnylaw.com richard.north@nelsonmullins.com Rosenbaum & Rosenbaum, P.C. Nelson Mullins Riley & 10 100 Wall Street, 15th Floor Scarborough LLP 201 147th St. NW, Ste. 1700 New York, NY 10005 11 P: 212-514-5007 Atlanta, GA 30363 12 F: 212-514-9178 P: 404-322-6000 Attorneys for Plaintiffs F: 404-332-6397 13 Attorneys for defendants C.R. Bard, Inc. And Bard Peripheral Vascular Inc. 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28